



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

RQ-2

Wayne E. Gilbert, Treasurer
Alliant Techsystems Inc. Employee
Citizenship Fund
600 Second Street, NE
Hopkins, MN 55343

MAR 8 2000

Identification Number: C00250209

Reference: Mid-Year Report (1/01/99-6/30/99)

Dear Mr. Gilbert:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The beginning cash balance of this report should equal the ending balance of your 1998 Year End Report. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-On Schedule A supporting Line 11(a)(i) of the Detailed Summary Page, your report disclosed contributions from individuals that omit the dates of receipt. Please amend your report by supplying the information. 11 CFR §104.3(a)(4)(i)

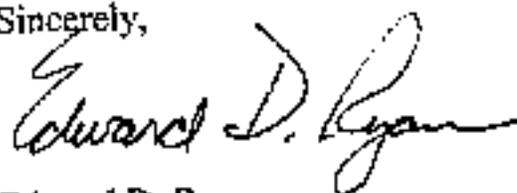
-Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the amount deducted per pay period or per month, whichever is used. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

-Your report includes computer produced formats of Schedule B. Computer produced formats may only be used upon prior approval of the Commission. You should submit a separate sample format with a cover letter requesting approval. Until your format has been approved, FEC forms must be used. 11 CFR §104.2(d)

-Your calculations for Line 8 appear to be incorrect. Cash-on-hand at the close of the current reporting period should always equal the closing calendar year-to-date cash-on-hand amount. Please provide the corrected total on the Summary Page.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,



Edward D. Ryan
Reports Analyst
Reports Analysis Division

PAYROLL DEDUCTIONS

SCHEDULE A		ITEMIZED RECEIPTS		Use separate schedule for each category in the Detailed Summary Page	PAGE OF
Contributions from Individuals				FOR LINE NUMBER	11(A)(1)
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of making contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.					
NAME OF COMMITTEE (in Full)					
National Organization PAC 00000001					
A. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt (see Period)	
Annis Sullivan 21 18th Street City, State ZIP		National Organization, Inc.		\$20.00	
Receipt for <input type="checkbox"/> Cash (check) <input type="checkbox"/> Primary <input type="checkbox"/> General		Occupation Branch Manager		(\$18)	
		Aggregate Year-to-Date >	085.00	(biweekly)	
B. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt (see Period)	
Rodney Jones 881 Hainsbury Road City, State ZIP		National Organization, Inc.		\$180.00	
Receipt for <input type="checkbox"/> Cash (check) <input type="checkbox"/> Primary <input type="checkbox"/> General		Occupation Vice President		(\$20 biweekly)	
		Aggregate Year-to-Date >	550.00		

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.6(b).

EXAMPLE: During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$90 for six pay periods) as "unitemized contributions" on Line 11(a)(1) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate space. (See item A in the illustration above.)

In-Kind Contributions

When determining whether to itemize an in-kind contribution, follow the same guidelines listed above under "When to Itemize Receipts." See page 8 for information on how to determine the dollar value of an in-kind contribution.

In addition, add the value of the in-kind contribution to the operating expenditures total on Line 21(b) (in order to avoid inflating the cash-on-hand amount). 104.13(a)(2).

If the in-kind contribution must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration at left.

IN-KIND CONTRIBUTIONS

SCHEDULE A		ITEMIZED RECEIPTS		Use separate schedule for each category in the Detailed Summary Page	PAGE OF
Contributions from Individuals				FOR LINE NUMBER	11(A)(1)
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of making contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.					
NAME OF COMMITTEE (in Full)					
National Organization PAC 00000001					
A. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt (see Period)	
Martin L. Kress 4 River Road City, State ZIP		National Organization, Inc.	8/19/84	\$5,999.00	
Receipt for <input type="checkbox"/> Cash (check) <input type="checkbox"/> Primary <input type="checkbox"/> General		Occupation Chairman		(IN-KIND CONTRIBUTION)	
		Aggregate Year-to-Date >	5,999.00		

SCHEDULE B		ITEMIZED DISBURSEMENTS		Use separate schedule for each category in the Detailed Summary Page	PAGE OF
Operating Expenditures/Other Federal				FOR LINE NUMBER	21(B)
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of making contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.					
NAME OF COMMITTEE (in Full)					
National Organization PAC 00000001					
A. Full Name, Mailing Address and ZIP Code		Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement (see Period)	
Martin L. Kress 4 River Road City, State ZIP		raffle prize	8/19/84	\$3,999.00	
Receipt for <input type="checkbox"/> Cash (check) <input type="checkbox"/> Primary <input type="checkbox"/> General		Disbursement for		(IN-KIND CONTRIBUTION)	
		Aggregate Year-to-Date >			

Itemize in-kind contributions on both Schedules A and B so as not to inflate the cash-on-hand amount.

